

**In the United States District Court  
for the Southern District of Texas  
Houston Division**

**JOINT STIPULATION REGARDING POST-VERDICT  
MOTIONS BRIEFING SCHEDULE**

Plaintiff Trinseo Europe GmbH (“Trinseo”) and Defendants Stephen Harper (“Harper”), Steve Harper Consulting, Inc. (“Harper Consulting”), Polycarbonate Consulting Services, Inc. (“PCS”), and Kellogg Brown & Root, LLC (“KBR”) (together, the “Parties”), by and through their undersigned attorneys, hereby jointly stipulate and agree as set forth herein to the following briefing schedule and deadlines as to the Parties’ post-verdict motions. Accordingly, the Parties jointly STIPULATE and AGREE as follows:

1. Trinseo’s Response to KBR’s Renewed Motion for Judgment as a Matter of Law (Doc. 326) shall be filed on or before **April 11, 2024**.
2. KBR’s and the Harper Defendants’ Response to Trinseo’s Sealed Motion to Enter Judgment (Doc. 328) and Sealed Motion for Entry of Permanent Injunction (Doc. 330) shall be filed on or before **April 15, 2024**.
3. Trinseo’s Response to the Harper Defendants’ Renewed Motion for Judgment as a Matter of Law (Doc. 333) shall be filed on or before **April 17, 2024**.

4. Replies to each of these responses shall be filed on or before 21 calendar days from the deadlines outlined above. Thus,

- a. KBR's and the Harper Defendants' Reply to Trinseo's Response to KBR's Renewed JMOL shall be filed on or before **May 2, 2024**;
- b. Trinseo's Reply to KBR's and the Harper Defendants' Response to Trinseo's Motions shall be filed on or before **May 6, 2024**; and
- c. The Harper Defendants Reply to Trinseo's Response to their JMOL shall be filed on or before **May 8, 2024**.

5. Sur-Replies, if any, to each set of replies shall be filed 17 calendar days from the date the reply is filed.

SO STIPULATED:

DATED: March 25, 2024

Respectfully submitted,

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**Certificate of Service**

I hereby certify that on March 25, 2024, a true and correct copy of above and forgoing document was served on the parties listed below electronically via the Court's CM/ECF noticing system and/or via email pursuant to the agreement of the parties.

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*/s/ Stewart Hoffer*  
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